

DPS:nmb

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

Criminal No.:

(01) CIPREAUNNI JA'VON STEWART

a/k/a Cipre Stewart, Cipreaunni Javon Stewart, Cipre
Aunni Stewart

(02) RYAN LAMARR CHAMBERS

a/k/a Ryan L. Chambers, Ryan Lamon Chambers,
Ryan Epps

11-mj-547 JSM

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

Count 1 On or about July 30, 2011 in, in the State and District of Minnesota, County of Wright, City of Buffalo, defendant(s) aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto in violation of Title 18 United States Code, Sections 2 and 1344.

Counts 2-13; See attached sheet.

I further state that I am a(n) Special Agent and that this complaint is based on the following

facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Francis P. McQuillan Jr.
Signature of Complainant

Francis P. McQuillan
Secret Service

Sworn to before me, and subscribed in my presence,

12/19/11
Date

The Honorable Janie S. Mayron
UNITED STATES MAGISTRATE JUDGE

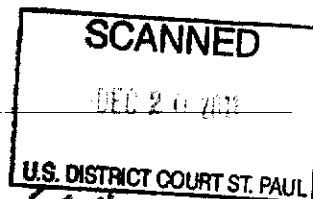
Name & Title of Judicial Officer

at

St. Paul, MN

City and State

Janie S. Mayron
Signature of Judicial Officer



Attachment to Complaint
United States v. Ci'Preaunni Ja'Von Stewart and
Ryan Lamarr Chambers

Count 2

on or about July 30, 2011, in the State and District of Minnesota, in the County of Wright, city of Buffalo, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 3

on or about July 30, 2011, in the State and District of Minnesota, in the County of Hennepin, City of Medina, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 4

on or about August 28, 2011, in the State and District of Minnesota, in the County of Washington, City of Oakdale the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 5

on or about August 28, 2011, in the State and District of Minnesota, in the County of Washington, City of Oakdale, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations,

Attachment to Complaint
 United States v. Ci'Preaunni Ja'Von Stewart and
 Ryan Lamarr Chambers

moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 6 Woodbury *FM* *Qm*

on or about August 28, 2011, in the State and District of Minnesota, in the County of Washington, City of ~~Oakdale~~ ^{Woodbury}, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 7

on or about August 28, 2011, in the State and District of Minnesota, in the County of Washington, City of Woodbury, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 8

on or about August 28, 2011, in the State and District of Minnesota, in the County of Ramsey, City of Vadnais Heights, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 9

on or about August 28, 2011, in the State and District of Minnesota, in the County of Ramsey, City of Vadnais Heights, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding

Attachment to Complaint
United States v. Ci'Preaunni Ja'Von Stewart and
Ryan Lamarr Chambers

and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 10

on or about October 2, 2011, in the State and District of Minnesota, in the County of Hennepin, City of St. Louis Park, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 11

on or about October 2, 2011, in the State and District of Minnesota, in the County of Hennepin, City of St. Louis Park, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Count 12

on or about October 2, 2011, in the State and District of Minnesota, in the County of Hennepin, City of Edina, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud U.S.A.A. Federal Savings Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

Attachment to Complaint
United States v. Ci'Preaunni Ja'Von Stewart and
Ryan Lamarr Chambers

Count 13

on or about October 2, 2011, in the State and District of Minnesota, in the County of Hennepin, City of Edina, the defendants, Ci'Preaunni Ja'Von Stewart, and Ryan Lamarr Chambers, aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud Winona National Bank, a financial institution whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in fraudulent transactions as set forth in the attached affidavit, continued on the attached sheet and made a part hereto, in violation of Title 18 United States Code, Section(s) 2 and 1344.

STATE OF MINNESOTA)
) SS. FRANCIS MCQUILLAN
COUNTY OF RAMSEY)

1. Your affiant, Francis McQuillan, being first duly sworn, states that the following is true and correct to the best of his knowledge and belief:

2. I am a Special Agent of the U.S. Secret Service, and have been so employed since June 2010. My duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of Federal laws, particularly those laws found in Title 18 of the United States Code.

3. I am a graduate of the Criminal Investigator Training Program of the Federal Law Enforcement Training Center (FLETC) in Brunswick, Georgia and the Special Agent Training Course at the U.S. Secret Service Training Center in Laurel, Maryland. I am currently assigned as a Special Agent with the Minneapolis Field Office, and am authorized to investigate certain criminal violations of federal law.

4. The facts in this affidavit come from my personal observations and information obtained from other law enforcement officers, investigators and witnesses. The information in this affidavit is provided for the limited purpose of establishing probable cause and does not set forth all of my knowledge about this matter. This is not a complete statement of all the facts related to this investigation.

5. In the fall of 2011, your affiant learned from investigators of the Target Corporation (hereafter "Target") that many Target retail stores in Minnesota were reporting that a group of subjects were engaged in a check fraud scheme, which was done by passing personal checks as "traveler's checks." This

scheme was conducted by individuals who made purchases of merchandise and gift cards at Target retail stores using personal checks drawn from accounts that were either closed or accounts that had insufficient funds. As part of the scheme to defraud, these individuals advised the Target cashier handling the transaction that the personal check was a "traveler's check" and told the Target cashier to enter the check into the register as a traveler's check.

6. Your affiant has learned from Target investigators that when a check is submitted to a Target retail cashier at a checkout register as a "traveler's check" under Target's normal procedure, it receives a special routing which bypasses the check authorization process that occurs when a personal check is passed at Target. Often several days pass between the time these checks are presented to Target and when they reach the financial institution holding the accounts from which the checks are drawn. Therefore, a person engaging in this type of scheme will have time to commit the fraud and leave the store by the time Target learns that the traveler's check is fraudulent.

7. Using Target store surveillance recordings and comparing them to driver's license photographs, Target investigators were able to identify Ci'Preaunni Ja'von STEWART (with the following aliases: Cipre Stewart, Cipreaunni Javon Stewart, Cipre Aunni Stewart); and Ryan Lamarr CHAMBERS, (with the following aliases: Ryan L Chambers, Ryan Lamon Chambers, Ryan Epps), using the name Dustin J. Lametti, as individuals engaged in the commission of the fraud scheme.

8. Target investigators have discovered that Ci'Preaunni Ja'Von STEWART and Ryan Lamarr CHAMBERS passed personal checks and claimed they were traveler's checks on several dates,

including, but not limited to: July 30, 2011, August 28, 2011 and October 2, 2011.

9. In December 2011, your affiant contacted USAA Federal Savings Bank and learned that the USAA Federal Savings Bank account with routing number 314074269, and account number 114000352, was opened under the name Cipre Stewart with an address in Minneapolis, Minnesota. The account was opened on October 15, 2010 and closed on February 8, 2011. The account was to be used with personal checks negotiated by Cipre Stewart, and was not a traveler's check account. USAA Federal Savings Bank also informed your affiant that all checks with routing number 314074269 and account number 114000352 passed after February 8, 2011 at Target retail stores were returned to Target because the account was closed.

10. In December of 2011, your affiant contacted Winona National Bank and learned that an account at the Winona National Bank with a routing number 091900216, account number 442 810, and listed account holder Dustin J. Lametti with an address in Winona, Minnesota, was opened on October 21, 2008 and closed on December 24, 2009. This account was to be used with personal checks negotiated by Dustin J. Lametti, and was not a traveler's check account. Winona National Bank is insured by the Federal Deposit Insurance Corporation.

11. In December of 2011, a representative of Winona National Bank informed your affiant that all checks with routing number 091900216 and account number 442 810, passed at Target retail stores after December 24, 2009, were returned to Target because the account was closed.

12. On July 30, 2011, at approximately 4:07 p.m., Target video surveillance shows Ci'Priaunni STEWART and Anthony CHAMBERS at a Target store in Buffalo, Minnesota. STEWART can be seen in the Target video surveillance making a purchase of two baby monitors and other baby items for \$376.19. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 246, and listed account holder Cipre Stewart, drawn on USAA Federal Savings Bank. The check was presented and signed by STEWART.

13. At approximately 4:11 p.m., video surveillance shows STEWART making a second purchase for \$424.00. The evidence from that transaction shows that the purchase was made with a personal check designated as a "traveler's check," in the amount of \$400.00, bearing routing number 314074269, account number 114000352, check number 247, listing the account holder as Cipre Stewart, drawn on USAA Federal Savings Bank. The check was presented and signed by STEWART. The remaining balance of the purchase was paid for with a Visa card. The purchase was for four \$100.00 gift cards.

14. On July 30, 2011, Target video surveillance shows Ryan CHAMBERS at the same Target store in Buffalo, Minnesota that STEWART was at on July 30, 2011. At approximately 4:09 p.m., Target video shows CHAMBERS making a purchase of bedding for \$335.01. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as a "traveler's check," bearing

routing number 091900216, account number 442 810, check number 1166, drawn on the Winona National Bank. The check was presented and signed by Ryan CHAMBERS using the name Dustin J. Lametti. Before the transactions at the Target store in Buffalo, Minnesota began, STEWART can be observed taking items out of the shopping cart CHAMBERS is pushing. STEWART and CHAMBERS can also be seen on Target video together on this date with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children. CHAMBERS is pushing a loaded shopping cart, followed closely by STEWART.

15. Later on July 30, 2011, video surveillance shows STEWART and CHAMBERS at a Target store in Medina, Minnesota. At approximately 4:48 p.m., STEWART can be seen in Target video surveillance making a purchase of diapers, a swaddle, a baby mobile, and a baby monitor for \$363.73. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 248, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART. Before the transactions at the Target store in Medina, Minnesota were completed, STEWART and CHAMBERS can be observed on Target video entering together, with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children. STEWART is slightly ahead while CHAMBERS is pushing a loaded shopping cart.

16. On August 28, 2011, Target video surveillance shows STEWART and CHAMBERS at a Target store in Oakdale, Minnesota. At approximately 4:22 p.m., STEWART can be seen making a purchase of movies, cleaning supplies and three \$100.00 gift cards for \$367.45. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing the routing number 314074269, account number 114000352, and check number 256, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART.

17. At approximately 4:26 p.m., Target video surveillance shows STEWART making a second purchase of three \$100.00 gift cards and batteries for \$343.15. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 257, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART.

18. On August 28, 2011, Target video surveillance shows CHAMBERS at the same Target store in Oakdale, Minnesota. At approximately 4:25 p.m., CHAMBERS is seen making a purchase of bedding and cleaning products for \$289.78. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1172. The check was presented and signed by Ryan CHAMBERS using the name Dustin J. Lametti. Before the transactions at the Target store

in Oakdale, Minnesota were completed, STEWART and CHAMBERS can be observed on Target video entering together, with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children. STEWART is pushing a shopping cart, followed closely by CHAMBERS pushing a shopping cart.

19. Later on August 28, 2011, Target video surveillance shows STEWART and CHAMBERS at a Target store in Woodbury, Minnesota. At approximately 4:59 p.m., STEWART can be seen in Target video surveillance making a purchase of a lamp, a baby monitor and baby swaddle for \$336.33. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 258, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART.

20. On August 28, 2011, Target video surveillance shows CHAMBERS at the same Target store in Woodbury, Minnesota. At approximately 5:01 p.m., CHAMBERS is seen making a purchase of a vacuum cleaner for \$427.43. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as a "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1173. The check was presented and signed by CHAMBERS using the name Dustin J. Lametti. The remaining balance of the purchase was paid for with a cash payment of \$40.00.

21. At approximately 5:03 PM, Target video surveillance shows CHAMBERS making a second purchase of several watches and three \$100.00 gift cards for \$369.83. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1174. The check was presented and signed by CHAMBERS using the name Dustin J. Lametti. Before the transactions at the Target store in Woodbury, Minnesota were completed, STEWART and CHAMBERS can be observed on Target video entering together, with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children.

22. Later on August 28, 2011, Target video surveillance shows STEWART and CHAMBERS at a Target store in Vadnais Heights, Minnesota. At approximately 5:39 p.m., STEWART can be seen in video surveillance making a purchase of three \$100.00 gift cards, one \$50.00 gift card, and greeting cards for \$375.87. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 259, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART.

23. At approximately 5:42 p.m., Target video surveillance shows STEWART making a second purchase of three \$100.00 gift cards, one \$50.00 gift card, a greeting card, and food for \$375.13. The evidence from that transaction shows that the

purchase was made with a personal check, designated as a "traveler's check," bearing routing number 314074269, account number 114000352, check number 260, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART.

24. On August 28, 2011, Target video surveillance shows CHAMBERS at the same Target in Vadnais Heights, Minnesota. At approximately 5:44 p.m., CHAMBERS is seen making a purchase of several watches, a wallet and three \$100.00 gift cards for \$358.69. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing the routing number 091900216, account number 442 810, and check number 1175. The check was presented and signed by CHAMBERS using the name Dustin J. Lametti. Before the transactions at the Target store in Vadnais Heights, Minnesota were completed, STEWART and CHAMBERS can be observed on Target video entering together, with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children. STEWART is pushing a loaded shopping cart, followed closely by CHAMBERS pushing a loaded shopping cart.

25. On October 2, 2011, Target video surveillance shows STEWART and CHAMBERS at a Target store in Saint Louis Park, Minnesota. At approximately 6:23 p.m., STEWART can be seen in video surveillance making a purchase of three \$100.00 gift cards, a DVD, cleaning products, and dental products for \$400.81. The evidence from that transaction shows that the

purchase was made with a personal check, designated as a "traveler's check," in the amount of \$400.00, bearing routing number 314074269, account number 114000352, check number 393, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART. The remaining balance of the purchase was paid for with a \$1.00 cash payment.

26. At approximately 6:25 p.m., Target video surveillance shows STEWART making a second purchase of one \$100.00 gift card and a breast pump for \$421.81. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," in the amount of \$400.00, bearing routing number 314074269, account number 114000352, check number 394, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART. The remaining balance of the purchase was paid for with a Visa card.

27. On October 2, 2011, Target video surveillance shows CHAMBERS at the same Target store in Saint Louis Park, Minnesota. At approximately 6:28 p.m., Target video surveillance shows CHAMBERS making a purchase of bathing/toiletry and cleaning supplies for \$352.32. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1183. The check was signed by CHAMBERS using the name Dustin J. Lametti.

28. At approximately 6:31 p.m., video surveillance shows CHAMBERS making a second purchase of three \$100.00 gift cards

and one \$50.00 gift card for \$373.00. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1184. The check was signed by CHAMBERS using the name Dustin J. Lametti. Before the transactions at the Target store in St. Louis Park, Minnesota were completed, STEWART and CHAMBERS can be observed on Target video entering together, with two small children. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the same two small children. STEWART is pushing a loaded shopping cart, followed closely by CHAMBERS also pushing a shopping cart.

29. Later on October 2, 2011, Target video surveillance shows STEWART and CHAMBERS at a Target store in Edina, Minnesota. At approximately 7:04 p.m., STEWART can be seen in Target video surveillance making a purchase of merchandise for \$433.36. The evidence from that transaction shows that the purchase was made with a personal check, designated as a "traveler's check," in the amount of \$400.00, bearing routing number 314074269, account number 114000352, check number 396, and listing the account holder as Cipre Stewart. The check was presented and signed by STEWART. The remaining balance of the purchase was paid for with a Visa card.

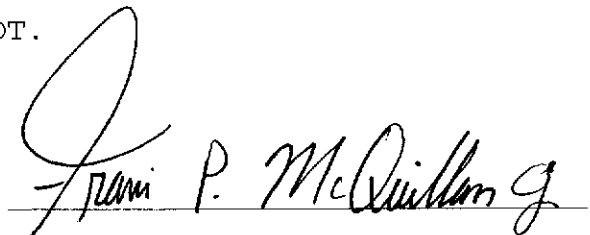
30. On October 2, 2011, Target video surveillance shows CHAMBERS at the same Target store in Edina, Minnesota. At approximately 7:06 p.m., CHAMBERS is seen on video surveillance making a purchase of three \$100.00 gift cards and one \$50.00

gift card for \$373.00. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number 091900216, account number 442 810, and check number 1185. The check was presented and signed by CHAMBERS using the name Dustin J. Lametti.

31. At approximately 7:08 p.m., video surveillance shows CHAMBERS making a second purchase of three \$100.00 gift cards and one \$50.00 gift card for \$373.00. The evidence from that transaction shows that the purchase was made with a personal check, drawn on the account of Dustin J. Lametti, designated as "traveler's check," bearing routing number of 091900216, account number 442 810, check number 1186. The check was presented and signed by CHAMBERS using the name Dustin J. Lametti. After these transactions were completed, STEWART and CHAMBERS are observed on Target video leaving the store together with the two small children. STEWART is carrying several bags while CHAMBERS carries out one of the children.

32. Based on the foregoing facts, I respectfully request that arrest warrants be issued for Ci'Preaunni Ja'Von STEWART, and Ryan Lamarr CHAMBERS for violations of Title 18, United States Code, Sections 2 and 1344, for aiding and abetting Bank Fraud.

FURTHER YOUR AFFIANT SAYETH NOT.

A handwritten signature in black ink, reading "Terri P. McQuillan". The signature is written in a cursive style with a large, looping initial "T".

FRANCIS P. MCQUILLAN

Special Agent

U.S. Secret Service

SUBSCRIBED AND SWORN to before me this

19th day of December, 2011

A handwritten signature in cursive script, reading "Janie S. Mayeron". The signature is written in dark ink and is positioned above the printed name and title.

Janie S. Mayeron

U.S. Magistrate Judge